

PENINSULA COLLEGE

1502 East Lauridsen Boulevard • Port Angeles, Washington 98362 • 360-452-9277

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FCC Mail Room

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Federal Communications Commission
445 12th Street SW
Washington D.C.

Commissioners,

Thank you for the opportunity extended by the Federal Communications Commission to provide our feedback on WC Docket No. 13-184, *Modernizing the E-rate Program for Schools and Libraries*. We are submitting this letter to recommend that rural community colleges be eligible to participate in the E-Rate 2.0 program. Rural community colleges are critical catalysts for educational opportunity and economic development throughout rural America. Yet, these institutions are at a critical disadvantage when it comes to offering students access to high-speed internet, which is not consistently available throughout much of the country where these colleges are located and, when internet access is available, it typically is at prices which far exceed those available to metropolitan colleges. Specifically, we at Peninsula College would like to request that the agency use its authority to expand the definition of schools and libraries to include rural community colleges.

Increasingly, the line between educational services offered at a high school and those available at a community college is becoming less stark. Through extensive dual-enrollment programs offered to high school students and through the considerable numbers of academic remediation programs available at community colleges, the community college of today is in many ways an extension of secondary education. In addition to offering educational programs that enhance the high school experience and classes aimed at assisting those who graduated but are not college-ready, the majority of community colleges also offer such programs as General Educational Development (GED), English as a Second Language (ESL) and other basic education services that are designed for students who may not intend to pursue a community college certificate or associate degree. These programs provide basic skills that prepare students for jobs and, in many cases, provide individuals with the possibility of pursuing a higher education.

Unfortunately, even though these educational services are vitally important to the economic development of the nation, community colleges are funded with substantially lower appropriations than primary and secondary schools. Likewise, they do not garner the level of state and federal funding that universities enjoy. This problem is particularly problematic for rural community colleges, whose lower enrollments and higher costs can impede the provision of opportune service levels.

Each year at Peninsula College (PC), approximately 328 high school students participate in dual-enrollment coursework, earning college credit as part of their high school education. Roughly 30 individuals pursue a high school diploma through the college's GED program. Nearly 124 individuals each year learn English, as Peninsula College is the largest provider of English as a Second Language courses on the north Olympic Peninsula. Additionally, 6776 students, both first-time students and those returning to higher education for new job skills training, enrolled in degree or certificate programs. Our ability to integrate these learners into the growing information-based economy is vital to their future career success and the economic success of our region.

Peninsula College is a public, comprehensive community college. It was founded in 1961 and is one of 34 community and technical colleges in the state of Washington. The College service district encompasses Clallam

and Jefferson Counties—an area of over 3,600 square miles. The region is home to six Native American tribal reservations, which are dispersed across the North Olympic Peninsula.

The main campus is located in Port Angeles. Extension sites are located in Forks, 57 miles west of Port Angeles, and in Port Townsend, 46 miles to the east. Peninsula College is the only resident institution of higher education on the North Olympic Peninsula.

Peninsula College plays a vitally important role in the state by making higher education accessible and affordable for residents of its rural service area who are often place-bound and would not otherwise be able to regularly travel well over one-hundred miles to the closest university. Furthermore, with the limited capabilities for broadband in our communities, distance learning is not a reliable option and, at times, it is not even a viable one. After hearing numerous stories of working individuals, many with small children at home, who could not pursue a bachelor's degree because of the arduous and time-consuming travel required to attend a college on the Peninsula, PC began offering a limited number of baccalaureate degrees.

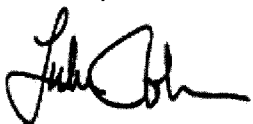
As an institution we grapple with the lack of adequate broadband capabilities that exists in this large sparsely populated service area. Given the mountainous geography and rural nature of our district, it is challenging and very expensive to provide high-speed internet access for our students. Many of our Tribal Communities reside outside any urban center and many miles from any highway. Over the last several years, the college has investigated the possibility of bringing broadband service to the remote areas of the Peninsula through fiber optic cable. In addition to enhanced broadband capability, fiber connectivity would enhance the often limited cellular service in these areas which remains a critical health and safety concern for the college administration and community.

The three PC sites serve as central points of internet access, where residents of each local community can gain access to distance learning and technical training. Typically, local citizens and students gather in the coffee shops and libraries at the local campuses. Our libraries, like most community colleges' libraries, are public and open to the local community. As such, they are hubs for educational research and require adequate internet capability. Unfortunately, under the current rules of the E-Rate 2.0 program, community college libraries are explicitly disallowed from participating in the e-Rate program, even if, as is the case for many rural community colleges, these libraries are the only public library for the area. We would request a review of the definition of a public library to include rural community college libraries which offer an invaluable service to the education opportunities for rural communities.

Modernizing the E-Rate program to allow rural community colleges to apply for funding support would provide considerable direct aid to institutions like Peninsula College to upgrade internet infrastructure and better provide modern, high-speed, reliable internet access. Expanding broadband accessibility within our rural service area would vastly enhance educational opportunities available to both post-secondary and K-12 students in our communities and would benefit the region as a whole. Community colleges are a key bridge to higher education and economic opportunity for hundreds of thousands of students nationwide, and nowhere is this role more pivotal than in rural America where these colleges are often the sole provider of so many services ranging from basic education and secondary remediation to higher education.

Thank you for considering our comments on this vital issue that will shape the future of education for rural America.

Sincerely,



Dr. Luke Robins, President
Peninsula College